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CORRES. CONTROL
INCOMING LTR NO.

20613 RF03

DUE DATE
ACTION



Department of Energy

CORRESPONDENCE
CONTROL
ROCKY FLATS FIELD OFFICE
10808 HIGHWAY 93, UNIT A
GOLDEN, COLORADO 80403-8200

JUN 29 2003

03-DOE-00763

DIST.	LTR	ENC
BERARDINI, J. H.	X	
BOGNAR, E. S.		
CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.	X	
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
FERRI, M. S.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.	X	
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A. M.	X	
RODGERS, A. D.	X	
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.	X	
WILLIAMS, J. L.		
5/1/03, T.	X	
5/1/03, C.	X	
5/1/03, L.	X	

Mr. Timothy Rehder
Rocky Flats Project Manager
U.S. Environmental Protection Agency, Region VIII
999 18th Street, Suite 500, EPR-FT
Denver, Colorado 80202-2466

Mr. Steven H. Gunderson
Rocky Flats Cleanup Agreement Project Coordinator
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Dear Gentlemen:

The U.S. Department of Energy Rocky Flats Field Office received the Environmental Protection Agency's June 12, 2003, approval letter regarding the No Further Accelerated Action (NFAA) Justification for Ash Pits, Trenches T-3, T-4, and T-7. We thank you for the NFAA approval, but believe that a clarification is needed regarding ecological risk. Based on our discussion in the June 23, 2003, project coordinator's meeting, we agreed to provide our rationale for the requested clarification.

Samples for T-7 and the Ash Pits contain several non-radionuclide analytes above ecological receptor soil action levels contained in the Rocky Flats Cleanup Agreement (RFCA) Attachment 5, Table 3, *Soil Action Levels*. The T-4 "burrito" samples, which have radionuclide contamination remaining after thermal desorption treatment, do not have concentrations above ecological receptor soil action levels. Thus, T-4 passes Screen 5 of RFCA Attachment 5, Figure 3, *Subsurface Soil Risk Screen*, but an evaluation of the threat posed to ecological receptors at T-7 and certain Ash Pits was triggered. Based on the evaluation documented in the NFAA Justifications it was determined that the depth and/or the limited areal extent of the contaminants at these locations do not require an accelerated action to address an ecological risk.

The NFAA Justifications recognize that ecological analytes of interest for all receptors/chemical combinations are not available. Evaluation of all analytes listed in the RFCA Attachment 5, Table 3, *Soil Action Levels* are being evaluated by the Ecological Risk Working Group for determination of ecological receptor soil action levels, if applicable. Since ecological soil action levels exist for radionuclides, T-4 would not be affected by the outcome of the Working Group's determination. An evaluation of the threat to ecological receptors was already triggered for T-7 and the Ash Pits based on other existing ecological receptor soil action levels. New ecological soil action levels for

COR. CONTROL
ADMIN. RECORD
PATS/130

Reviewed for Addressee
Corres. Control RFP

7/2/03
Date By

Ref. Ltr. #

DOE ORDER #

NONE

1/2

ADMIN RECORD

BZ-A-000606

Mr. Timothy Rehder
Mr. Steven H. Gunderson
03-DOE-00763

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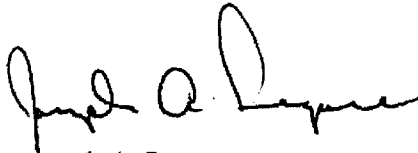
JUN 29 2003

other analysts/receptors (if any are ultimately relevant to the buried material at T-7 and the Ash Pits) would not result in a conclusion that ecological risk at these sites is sufficient to trigger an accelerated action because of the depth and/or the limited areal extent of the contaminants at these locations.

The NFAA Justifications acknowledge that ecological risks posed by contamination at the Rocky Flats Environmental Technology Site must be evaluated in the Comprehensive Risk Assessment. That assessment may result in actions being required at these Individual Hazardous Substance Sites to adequately protect ecological resources as part of any final remedy. However, we maintain that the NFAA Justifications do support a conclusion that T-4 "burrito", and the buried contents of T-7 and the Ash Pits do not pose a significant ecological risk. We request that your approval letter be clarified accordingly.

If you should have any questions regarding this request, please contact Norma I. Castaneda, of my staff, at (303) 966-4226, or you may contact me at (303) 966-2282.

Sincerely,



Joseph A. Legare
Assistant Manager
for Environment and Stewardship

cc:

E. Schmitt, OOM, RFFO
R. DiSalvo, CR, RFFO
N. Castaneda, ER, RFFO
L. Butler, K-H
G. Kleeman, USEPA
C. Spreng, CDPHE
Administrative Record

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